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6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9
10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 JACQUELINE LOUISA GENTLE, et al.,

14 Defendants.

CASE NO.: 2:12-cr-00463-JCM-VCF

**STIPULATION TO CONTINUE
SENTENCING HEARING AND
PROPOSED ORDER**

(2nd Request)

15
16 Defendant Jacqueline Gentle, by and through her attorney of record, Kathleen Bliss, Esq.,
17 of the law firm Kathleen Bliss Law PLLC; and Assistant United States Attorney J. Gregory
18 Damm, hereby stipulate and request that the Court vacate the sentencing hearing in this matter
19 currently set for June 2, 2016, and continue it until June 29, 2016, or a time thereafter most
20 convenient for the Court.

21 In support of this Stipulation, the parties show the Court as follows:

- 22 1. The additional time requested by this Stipulation to Continue Sentencing Hearing is
23 reasonable pursuant to Fed.R.Crim.P. 32(b)(2), which states that the “court may, for
24 good cause, change any time limits prescribed [for sentencing] in this rule.”
25 2. The parties are requesting additional time to allow court-approved mitigation expert
26 Dr. John Paglini, Ph.D. to interview Ms. Gentle in preparation of her sentencing.
27 3. Several legitimate mitigation factors have been identified that may have affected Ms.
28

Gentle's role in the offense.

4. Dr. Paglini has informed counsel for Ms. Gentle that his interview of Ms. Gentle will require two (2) visits; one on May 27, 2016 and another on June 3, 2016. Ms. Gentle is currently being detained at the Nevada Southern Detention Center in Pahrump.
5. Dr. Paglini has informed counsel for Ms. Gentle that his final report will be completed by June 21, 2016.
6. Defense counsel for JACQUELINE GENTLE has spoken to her client, who is currently in custody, and she has no objection to the continuance.
7. Based on Dr. Paglini's schedule, counsel for Ms. Gentle and the Government and hereby stipulate and agree to vacate Ms. Gentle's June 2, 2016, sentencing date and continue it until June 29, 2016, or a time thereafter most convenient to the Court.
8. The additional time requested herein is not sought for purposes of delay.
9. Denial of this request for a continuance would deny counsel for the defendants sufficient time, to effectively and thoroughly prepare for sentencing. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

This is the second stipulation to continue filed herein.

Dated: May 13, 2016.

KATHLEEN BLISS LAW PLLC

/s/ Gregory Damm

/s/ Kathleen Bliss

J. GREGORY DAMM

KATHLEEN BLISS, ESQ.

Assistant United States Attorney

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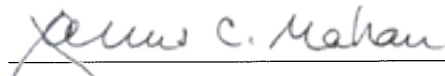
ORDER

The Court, having reviewed the Stipulation to Continue Sentencing, finds good cause to GRANT the parties' request.

IT IS HEREBY ORDERED that the defendant's sentencing hearing currently scheduled for June 2, 2016, is hereby VACATED.

IT IS FURTHER ORDERED that defendant's sentencing hearing is reset for JUNE 29 _____, 2016, at 10:30 a.m.

DATED May 16, 2016.



The Honorable James C. Mahan

United States District Court Judge

CERTIFICATE OF SERVICE

In accordance with Rule 49(c) of the Federal Rules of Criminal Procedure and Rule 47-11 of the Local Rules of Practice of the United States District for the District of Nevada, I certify that I am an employee of KATHLEEN BLISS LAW PLLC, and that on this 13th day of May 2016, I did cause a true copy of:

STIPULATION TO CONTINUE SENTENCING AND PROPOSED ORDER

To be served via electronic service by the U.S. District Court CM/ECF system to the parties on the Electronic Filing system in this action.

By: /s/ Sylvia Bishai

An employee of
KATHLEEN BLISS LAW, PLLC